UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MARTIN D. BORST   : CHAPTER 13
      Debtor   :
                                      :
  JACK N. ZAHAROPOULOS   :
  STANDING CHAPTER 13 TRUSTEE   :
      Movant   :
                                      :
      vs.   :
                                      :
  MARTIN D. BORST   :
      Respondent   : CASE NO.   5-22-bk-02019

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

      AND NOW, this   29th   day of March, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

      1.   Debtor(s)' plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7.   More specifically, the debtor has excess non-exempt equity in the following:

          a.   Residential real estate.   The Trustee has requested
              proof of the value of the debtor's home as stated in
              his schedules -   CMA needed.

      2.   Trustee avers that debtor(s)' plan cannot be administered due to the lack of the following:

          a.   Proof of Claim for Bradford Tax Bureau

      WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

          a.   Deny confirmation of debtor(s) plan.

b. Dismiss or convert debtor(s) case.

c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
            Attorney for Trustee

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CERTIFICATE OF SERVICE

AND NOW, this 29th day of March, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

David Harris, Esquire
69 Public Square, Suite 700
Wilkes Barre, PA   18701

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee